

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Competitive Product Prices
International Priority Airmail, Commercial ePacket,
Priority Mail Express International, Priority Mail
International & First-Class Package International
Service With Reseller Contract 1 (MC2020-160)
Negotiated Service Agreements

Docket No. CP2020-183

PUBLIC REPRESENTATIVE COMMENTS ON
NOTICE OF POSTAL SERVICE FILING MODIFICATION ONE TO INTERNATIONAL
PRIORITY AIRMAIL, COMMERCIAL EPACKET, PRIORITY MAIL EXPRESS
INTERNATIONAL, PRIORITY MAIL INTERNATIONAL & FIRST-CLASS PACKAGE
INTERNATIONAL SERVICE WITH RESELLER CONTRACT 1 NEGOTIATED
SERVICE AGREEMENT

(December 23, 2020)

The Public Representative hereby provides comments pursuant to the Commission's Notice in this docket.¹ In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of Filing of Modification One to International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International, and First-Class Package International Service With Reseller Contract 1.²

The Postal Service's Notice includes a certified statement as required by 39 C.F.R. § 3035.105(c)(2), a public (redacted) version of Modification One to Contract 1,

¹ PRC Notice Initiating Docket No. CP2020-183, December 16, 2020.

² Notice of the United States Postal Service of Filing Modification One to IPA, CeP, PMEI, PMI & FCPIS With Reseller Contract 1 NSA, December 15, 2020.

and supporting financial data estimating the contract value during the first year. The Postal Service also filed under seal an unredacted version of Modification One to Contract 1, and supporting financial data.

In Order No. 5571, the Commission approved the Postal Service's request to add a new product identified as International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International, and First-Class Package International Service With Reseller Contract 1 to the Competitive Product List.³ The instant Modification revises Articles 2, 3, 8, 14, 20 and 22 of the Agreement, changes Article 20 so that the Agreement will remain in effect until February 28, 2023, and adds annexes 1A, 2A, 3A, 4A, 5A, 6A, 7A, 8A and 9A to the Agreement. *Attachment A, at 1.*

COMMENTS

The Public Representative has reviewed the Postal Service's Notice of Modification to International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International, and First-Class Package International Service With Reseller Contract 1 and the financial data filed under seal with the Postal Service's Notice. Based upon that review, the Public Representative concludes that Contract 1, as modified, should continue to generate sufficient revenues to cover costs and thereby satisfy 39 U.S.C. § 3633(a) and thus should be approved by the Commission.

Finally, the Postal Service must file revenue and cost data for Contract 1 in future Annual Compliance Reports. This data will permit the Commission to annually review the financial results for Contract 1 for compliance with 39 U.S.C. § 3633(a).

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

³ See Order No. 5571 Order Adding International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International, and First-Class Package International Service with Reseller Contracts to the Competitive Product List, Docket Nos. MC2020-160 and CP2020-183, June 30, 2020.

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